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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FIRST KEYSTONE CONSULTANTS,
INC., ROBERT SOLOMON and JANE
SOLOMON,

Plaintiffs,

- against -

SCHLESINGER ELECTRICAL
CONTRACTORS, INC., JACOB LEVITA,
and JPMORGAN CHASE & CO.,

Defendants.

10 Civ. 0696 (KAM)(SMG)

ECF Case

**DECLARATION OF ROBERT SOLOMON IN
OPPOSITION TO MOTION OF SCHLESINGER
DEFENDANTS FOR PROTECTIVE ORDER**

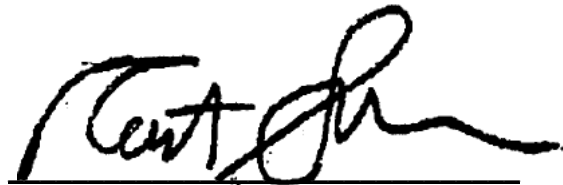
1. I am the Vice-President of Plaintiff, First Keystone Consultants, Inc., and am individually a Plaintiff in the captioned action. I am fully familiar with the facts of this case and of the surrounding circumstances, and make this Declaration in support of the Plaintiffs' Objection to the Motion of Schlesinger Electrical Contractors, Inc. ("SEC") and Jacob Levita ("Levita" and, together with SEC, the "**Schlesinger Defendants**") for a Protective Order in connection with Plaintiffs' Requests for Documents and Inspection.

2. I have read the Declaration in Support of Objection to Motion for Protective Order of my attorney, Richard H. Agins, and I adopt each and every one of the statements contained therein as my own, and as if set forth in their entirety in this, my own Declaration.

3. For all of the reasons set forth herein by reference, the Motion for Protective Order of the Schlesinger Defendants should be denied in its entirety.

I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: Port St. Lucie, Florida
September 1, 2010

A handwritten signature in black ink, appearing to read 'Robert Solomon', written over a horizontal line.

ROBERT SOLOMON